

EXHIBIT A

barry.ingberlawfirm@gmail.com

From: ingber.lawfirm@gmail.com
Sent: Friday, June 14, 2019 4:36 PM
To: 'Kadosh, Samuel'; 'Raymond, Peter D.'; 'Berman, Jeremy A.'
Cc: asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: Industria v. Latinfood, et al- DISCOVERY
Attachments: AEO CIB-000268-AEO CIB-000269.pdf

Importance: High

Sam,

In connection with your below June 12, 2019 emails we respond as follows:

Firstly, you state you “have discovered additional facts concerning these topics.” We request that you elaborate and identify what you are referring to in particular, which you believe necessitates maintaining Topics 28-34 in a deposition of Defendants.

Secondly, we will not consent to providing Industria with a second bite of the deposition apple and have a wholesale redo of Defendants’ February, 2018 “spoliation” deposition. Defendants have already testified in full as to “Topics for Examination” numbers 28-32, and it necessarily follows that they could not identify the “lost documents which were contained on the failed hard drive” (Topic #33) because the data was lost. Notwithstanding that, in the spirit of cooperation and in an effort to provide transparency, Defendants addressed Topic 34 by seeking the assistance of Latinfood’s customers in an effort to secure any email communications that were lost due to their hard drive failure (see attached example). We also note that Cibao Meats provided responsive data in their document production (please refer to Betty Tufariello’s April 3, 2019 email). Defendants also withdrew their objections to Industria’s subpoenas to Network Solutions and Google in a further sign of cooperation. Notwithstanding the foregoing, we have no objection to limited questions surrounding the email communications between Defendants & Cibao Meats provided in Cibao’s document production and/or testimony on those email communications by Jaline Isidor Horta during her March 7, 2019 deposition.

Thirdly, please advise if you have received any data from Google or Network Solutions, and if so, provide copies to us immediately.

Furthermore, we also need an **immediate** ETA on the Meet and Confer documents/info that we have been seeking for months related to the Industria April 11-12, 2019 deposition, and as were most recently set forth in our below June 7th email. To date, we have only received what appears to be Industria’s Work for Hire documents (most of which appear to be undated). Please provide an English translation of these Spanish documents forthwith.

We also note that you have ignored and/or refused to confirm the below:

- “You advised that once the Industria deposition issues are resolved, then you expect to confirm deletion of the audio recording from the Industria April 11-12, 2019 deposition.”

We also remain bewildered at your inexplicable refusal to consent to an extension of the July 15, 2019 fact discovery deadline. This flies in the face of reason, given the upcoming depositions; flurry of discovery issues; judicial and personal vacation schedules during the summer months; and your clients’ routine, dilatory response

time. For example, we noticed CordialSA for a May 29th deposition and after you initially agreed, you subsequently pushed it back 1½ months so that it would take place on July 11th, a scant 4 days before the current discovery deadline, understanding that there will likely be follow up requests (we have already been waiting 2+ months to receive supplemental documents from Mr. Salazar's deposition on April 11-1). Furthermore, you will be needing to Reply to the 4th Amended Answer which is still awaiting to be "So Ordered" by the Court before it can be filed. Given the above delays on the part of your clients, it is unlikely that a 60-day stipulated extension of the current July 15, 2019 fact discovery deadline to September 9, 2019 will suffice (it took months for you to even confirm that Mr. Arango did not need a translator). Finally, as previously advised, I will be taking family leave time upon the imminent birth of my first grandchild and this will directly impact my schedule for the balance of this month, including the currently scheduled June 28th deposition of Wilson Zuluaga. This is a reason why it needs to be rescheduled for no earlier than the week(s) of July 8th and 15th (assuming we are able to agree to a resolution on the Topics to be covered). If we cannot quickly agree on the above, then we intend to request judicial intervention in the joint status letter which is due on June 21, 2019.

Finally, we expect to be forwarding you a proposed Stipulation of Facts which might obviate the necessity of proceeding with a supplemental Industria 30(b)(6) witness and/or the noticed depositions of Industria witnesses Diego Medina, Santiago Jimenez, Francisco Ospina and Martha Elena Ochoa Evans for the reasons set forth in our May 3 and May 30th letters. This issue will likely also need to be included in the joint status letter which is due on June 21, 2019.

Regards,

Mark J. Ingber, Esq.
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 51 JFK Parkway
 First Floor West, Suite 159
 Short Hills, NJ 07078
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 in the practice of Intellectual Property
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 US IMMEDIATELY BY TELEPHONE SO THAT WE CAN
 ARRANGE FOR THE RETURN OF THE ORIGINAL DOCUMENTS
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From: Kadosh, Samuel <SKadosh@ReedSmith.com>
Sent: Wednesday, June 12, 2019 3:42 PM
To: ingber.lawfirm@gmail.com; Raymond, Peter D. <PRaymond@ReedSmith.com>; Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: RE: Industria v. Latinfood, et al-LETTER TO PLAINTIFF RE LATINFOOD'S DISCOVERY

Mark -

We do not consent to exclude questions regarding spoliation from Mr. Zuluaga's deposition. The prior deposition took place more than a year ago, and we have discovered additional facts concerning these topics about which we are entitled to ask Mr. Zuluaga.

Best,

Samuel Kadosh
212-549-0451
SKadosh@ReedSmith.com

Reed Smith
599 Lexington Avenue
New York, NY 10022
212-521-5400 (Main Number)
212-521-5450 (Fax Number)

From: Kadosh, Samuel <SKadosh@ReedSmith.com>
Sent: Wednesday, June 12, 2019 3:42 PM
To: ingber.lawfirm@gmail.com; Raymond, Peter D. <PRaymond@ReedSmith.com>; Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: RE: Industria v. Latinfood, et al-LETTER TO PLAINTIFF RE LATINFOOD'S DISCOVERY

Mark,

Please see my responses below.

Samuel Kadosh
212-549-0451
SKadosh@ReedSmith.com

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New York, NY 10022
212-521-5400 (Main Number)
212-521-5450 (Fax Number)

From: ingber.lawfirm@gmail.com <ingber.lawfirm@gmail.com>
Sent: Friday, June 7, 2019 5:11 PM
To: Kadosh, Samuel <SKadosh@ReedSmith.com>; Raymond, Peter D. <PRaymond@ReedSmith.com>; Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: asha.ingberlawfirm@gmail.com; barry.ingberlawfirm@gmail.com
Subject: Industria v. Latinfood, et al-LETTER TO PLAINTIFF RE LATINFOOD'S DISCOVERY
Importance: High

EXTERNAL E-MAIL

Sam,

It's not enough that you won't object to filing of the amended answer, as we discussed today, we will want a Stipulation as previously done (see attachment). We also want confirmation of below:

- You explained that Peter is unavailable for a deposition of our clients on July 1st or July 2nd. We have checked with our client and are advised that he can make himself available on June 28, 2019 or **preferably** during the weeks of July 8 and July 15. Please provide us with an Amended Deposition Notice asap (if you want to have the deposition on June 28th, 2019, then we need to receive your Amended Deposition Notice no later than Monday, June 10, 2019).

Sent

- Please confirm your statement today that Mr. Arango will not require a translator for his 30(b)(6) July 11, 2019 deposition and that it will cover the attached Amended Deposition Topics referred to in our May 30, 2019 letter.

We confirm that Mr. Arango is not requesting a translator. We have a few minor edits to the CordialSA 30(b)(6) deposition notice. Please send as a word document, and we will provide the edits.

- In response to Peter's June 7th letter today regarding the additional Industria 30(b)(6) witness, we stand by our May 3 and May 30th arguments. Nevertheless, we will consider your proposal that we prepare and forward to you a Stipulation of Facts which might obviate the necessity of having a Supplementary Industria 30(b)(6) witness.

To be clear, Industria did not agree to enter into any stipulation, but we will review any stipulation you draft.

- You will provide us with an ETA on the follow-up Meet and Confer documents/info that we have been seeking for months related to the Industria April 11-12, 2019 deposition, and as were most recently set forth in our May 30, 2019 letter.

Agreed.

- You advised that once the Industria deposition issues are resolved, then you expect to confirm deletion of the audio recording from the Industria April 11-12, 2019 deposition.
- Given the upcoming depositions, flurry of discovery issues and judicial and personal vacation schedules during the summer months, a 60-day stipulated extension of the current July 15, 2019 fact discovery deadline (past Labor Day) is necessary and will enable the parties to respond and follow up on deposition and discovery related issues.

We do not agree that a discovery extension is necessary at this time.

Please review and advise asap.

Regards,

Mark J. Ingber, Esq.
The Ingber Law Firm

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US IMMEDIATELY BY TELEPHONE SO THAT WE CAN
ARRANGE FOR THE RETURN OF THE ORIGINAL DOCUMENTS
TO US AT NO COST TO YOU.

asha.ingberlawfirm@gmail.com

From: Mark Ingber <ingber.lawfirm@gmail.com>
Sent: Thursday, April 4, 2019 10:22 AM
To: asha.ingberlawfirm@gmail.com
Subject: Fwd: Follow-Up Requests from Ms. Isidor Horta's Deposition

Sent from my iPhone

Begin forwarded message:

From: Betty Tufariello <PBTufariello@intellectulaw.com>
Date: April 3, 2019 at 7:03:41 PM EDT
To: "Berman, Jeremy A." <JBerman@reedsmith.com>
Cc: "Raymond, Peter D." <PRaymond@ReedSmith.com>, Alina Orban <AOrban@intellectulaw.com>, "Kadosh, Samuel" <SKadosh@ReedSmith.com>, Mark Ingber <ingber.lawfirm@gmail.com>, "ingber.law@verizon.net" <ingber.law@verizon.net>, Betty Tufariello <intellectulaw@gmail.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Jeremy:

Good afternoon. I hope my email finds you and your colleagues well.

Set forth below is a link to all of the emails my client was able to retrieve following her search, the scope of which we set forth in our March 22, 2019 email.

<https://www.dropbox.com/sh/otgitjo6az9k8h7/AACSxRJciGKv912HuitisbyEa?dl=0>

For ease of identification, the link sets forth the emails in date order. Further, if the email makes reference to an attachment, the attachments follow the email they are referenced to (if we found them) numbered consecutively. The only attachments we have provided are the one we actually found attached to the emails.

The link also contains our client's Deposition Errata Sheets. It the last file in the folder to which the link directs you to.

Here for you- Betty.

Your Brand Professional- Your better business partner.

P. Betty Tufariello, Esq.
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25 Little Harbor Road
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E-mail: pbtufariello@intellectulaw.com
Twitter: <https://twitter.com/intellectulaw>

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From: Berman, Jeremy A. [<mailto:JBerman@reedsmith.com>]

Sent: Wednesday, April 03, 2019 12:34 PM

To: Betty Tufariello <PBtufariello@intellectulaw.com>

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>;

Kadosh, Samuel <SKadosh@ReedSmith.com>

Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Your March 29 email stated that you would be making a document production by the end of that day, but we have not received any documents to date. Please confirm that you will make the additional production today.

Best,

Jeremy Berman

212.549.4241

JBerman@reedsmith.com

ReedSmith LLP

599 Lexington Ave | New York | NY | 10022

Phone: 212.521.5400 | Fax: 212.521.5450

From: Betty Tufariello <PBtufariello@intellectulaw.com>

Sent: Friday, March 29, 2019 3:34 PM

To: Berman, Jeremy A. <JBerman@reedsmith.com>

Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>;

Kadosh, Samuel <SKadosh@ReedSmith.com>

Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Hi Jeremy:

We have received the emails our client has secured as a result of her searching pursuant to your requests. We have just completed our conversion and we are in the process of redacting any and all information that we believe is protected by the attorney-client privilege. After that, we will be numbering and submitting everything to you. It is our objective to provide everything to you by the end of the day today, if not sooner.

Here for you- Betty.

Your Brand Professional- Your better business partner.

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From: Berman, Jeremy A. [<mailto:JBerman@reedsmith.com>]
Sent: Friday, March 29, 2019 2:11 PM
To: Betty Tufariello <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Per your March 22, 2019 email, we expected a production of additional documents no later than today. Can you confirm that you will be making the production today? Also, can you provide us with the results of the outstanding searches identified in Sam's March 22 email?

Best,

Jeremy Berman
212.549.4241
JBerman@reedsmith.com

ReedSmith LLP
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Phone: 212.521.5400 | Fax: 212.521.5450

From: Kadosh, Samuel <SKadosh@ReedSmith.com>
Sent: Friday, March 22, 2019 5:07 PM
To: 'Betty Tufariello' <PBtufariello@intellectulaw.com>; Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Thank you for the update. We also asked that Ms. Horta search the portable hard drive that she used for backup for emails or files relating to Latinfoods, and that Julio Isidor's office and computer be searched for hard-copy and electronic files he may have. I look forward to seeing the additional production next week.

Best Regards,

Samuel Kadosh
212-549-0451
SKadosh@ReedSmith.com

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599 Lexington Avenue
New York, NY 10022
212-521-5400 (Main Number)
212-521-5450 (Fax Number)

From: Betty Tufariello <PBtufariello@intellectulaw.com>
Sent: Friday, March 22, 2019 12:37 PM
To: Berman, Jeremy A. <JBerman@reedsmith.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>; Alina Orban <AOrban@intellectulaw.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

EXTERNAL E-MAIL

Jeremy:

Good Morning.

Our client has in fact forwarded some emails. But she is not done yet. She will be forwarding additional materials by the beginning of next week.

We are in the process of reviewing and formatting what she has already sent to us and we will be producing everything next week, once our client is done forwarding everything. From our review of what we already have in hand, I can assure you that it contains nothing that you don't already have. So, I have to disagree with your representations that your client has been prejudiced in any way.

As per your request during her deposition our client has conducted the following searches:

In connection with the account Jalinei@cibaomeat.com, Ms. Horta searched the following email addresses:

- wilzul68@gmail.com . She located only a smattering of emails which she has provided us with for production.
- WilsonZ@latinfoodus.com. She located a few more emails which she will be forwarding to us shortly via a link, as they are in a format that she cannot send to us through normal email.
- WILSON.ZULUAGA@LATIN-FOOD.COM. She found only 1 email.
-

In connection with the account JGIsidor88@gmail.com, Ms Horta searched the following email addresses:

- wilzul68@gmail.com. She located 1 email RE: Casings Revised with New Logo
- WilsonZ@latinfoodus.com. She located only a few.

- WILSON.ZULUAGA@LATIN-FOOD.COM . Once again she only found 1.

In connection with JGIsidor88dr@hotmail.com, Ms. Horta searched the following email addresses:

- wilzul68@gmail.com NONE
- WilsonZ@latinfoodus.com NONE
- WILSON.ZULUAGA@LATIN-FOOD.COM NONE

In connection with YaviPhotography@gmail.com, Ms. Horta searched the email addresses set forth below:

- wilzul68@gmail.com: No results
- WilsonZ@latinfoodus.com No results
- WILSON.ZULUAGA@LATIN-FOOD.COM No results.

In connection with YaviPortraits@gmail.com, Ms Horta searched the following email addresses:

- wilzul68@gmail.com. No results.
- WilsonZ@latinfoodus.com No results.
- WILSON.ZULUAGA@LATIN-FOOD.COM No results.

Ms. Horta's attempt to secure emails from Cibao Meats' webmail was unavailing as Emails from cibaomeat.com/webmail are no longer available. The way settings have been set up, emails are deleted and the queue is emptied once emails are forwarded to Ms. Horta's and other Cibao employees' Outlook accounts. Accordingly, when her IT specialist searched for emails in Cibao's Webmail server, he found nothing.

At this time the only search left outstanding is the search in Mr. Julio Isidor's own Outlook email account. We should be able to provide you with an update on that search early next week.

Please let me know whether our search parameters are acceptable to you or if there are any other terms you might want our client to search so that she can conduct that search as well, in time for next week's production.

Regards,

P. Betty Tufariello, Esq.
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From: Berman, Jeremy A. [<mailto:JBerman@reedsmith.com>]
Sent: Friday, March 22, 2019 10:41 AM
To: Betty Tufariello <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

Will you be providing this information today?

Jeremy Berman
212.549.4241
JBerman@reedsmith.com

ReedSmith LLP
599 Lexington Ave | New York | NY | 10022
Phone: 212.521.5400 | Fax: 212.521.5450

From: Berman, Jeremy A.
Sent: Wednesday, March 20, 2019 2:51 PM
To: 'Betty Tufariello' <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: RE: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

I write to follow up on my March 13 email requesting additional documents identified at Ms. Horta's deposition. My client has suffered substantial prejudice because Ms. Horta and Cibao have not searched through all of their devices and emails for relevant documents, as required by the subpoena.

Please provide the requested information by Friday, March 22.

Jeremy Berman
212.549.4241
JBerman@reedsmith.com

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Phone: 212.521.5400 | Fax: 212.521.5450

From: Berman, Jeremy A.
Sent: Wednesday, March 13, 2019 10:17 AM
To: 'Betty Tufariello' <PBtufariello@intellectulaw.com>
Cc: Raymond, Peter D. <PRaymond@ReedSmith.com>; Kadosh, Samuel <SKadosh@ReedSmith.com>
Subject: Follow-Up Requests from Ms. Isidor Horta's Deposition

Betty,

I write to follow up on our request for additional documents identified at the deposition of Ms. Horta on March 7, 2019. Specifically, we request that:

- Ms. Horta's Gmail account, into which emails from her work account were automatically forwarded, be searched for responsive documents. *See* Tr. 94:19-96:2.
- Ms. Horta's personal email account be searched for responsive documents. *See* Tr. 94:15-18.
- The Cibao email accounts of Jaline Isidor Horta and Julio Isidor be searched for responsive documents. The search should encompass emails that (a) are stored locally on their individual computers, (b) are stored on company servers, (c) can be accessed through Cibao's direct web email interface, or (d) can be accessed by any other means through which emails in that system can be retrieved. *See* Tr. 96:6-97:9, 99:4-14.
- The Gmail account for Yayi Photography be searched for responsive documents. *See* Tr. 97:10-23.
- Ms. Isidor Horta's external hard drive be searched for responsive documents. *See* Tr. 98:14-99:6.
- All responsive documents located in Mr. Isidor Horta's office be produced. *See* Tr. 107:3-16.
- Julio Isidor's computer be searched for responsive documents. *See* Tr. 110:10-16.

A copy of the transcript of Ms. Horta's deposition is attached. Please provide us the requested information no later than March 18, 2019.

Best regards,

Jeremy Berman
212.549.4241
JBerman@reedsmith.com

ReedSmith LLP
599 Lexington Ave | New York | NY | 10022
Phone: 212.521.5400 | Fax: 212.521.5450

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